

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VA
HARRISONBURG DIVISION

IN RE:
NORBERTO S. CRAMARO
Debtor(s)

BCN#: 10-50722\RWK
Chapter: 13

OBJECTION OF CHASE HOME FINANCE, LLC
TO PROPOSED CHAPTER 13 PLAN AND
CONFIRMATION THEREOF

CHASE HOME FINANCE, LLC, and its assignees and/or successors in interest, a secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objections to the confirmation of the Chapter 13 Plan proposed by Debtor:

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 593 N DR, Winchester, VA 22603; the promissory note and deed of trust were attached to the proof of claim filed by the secured creditor.
2. The debtor is due for 3 pre-petition monthly payments in the amount of \$1,446.11 each and accrued late charges in the amount of per month and the late charges are \$250.44.
3. The proposed Plan does not set forth a reasonable schedule and time period for the payment of arrearages on the deed of trust.
4. The proposed Chapter 13 plan does not provide this objecting secured creditor with adequate protection or adequate security, according to Sections 362 and 1325(a) of the Code.
5. As indicated by the debtor's payment history and schedules, the Plan is not feasible.
6. The Plan does not propose to pay the secured creditor's entire claim as shown in its proof of claim filed on June 7, 2010 in the amount of \$3,800.27.

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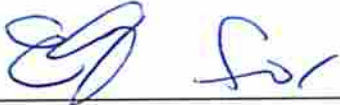
CONCLUSION

Any Chapter 13 Plan proposed by Debtors must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by Debtor be denied.

WHEREFORE, secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. That a hearing be held July 7, 2010, at 10:00AM at 116 N. MAIN STREET, 3RD FLOOR, HARRISONBURG VA on this objection.
4. For such other relief as this Court deems proper.

Dated: Respectfully submitted
CHASE HOME FINANCE, LLC
By Counsel:



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I certify that I have electronically transmitted and/or mailed true copies of the above Objections to the Chapter 13 Plan, by First Class Mail, postage prepaid on this 10 day of June, 2010 to the following:

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